

**FILED**  
JEANNE A. NAUGHTON, CLERK

DEC - 1 2023

U.S. BANKRUPTCY COURT  
TRENTON, NJ  
BY *[Signature]* DEPUTY

George S. Wynns  
124 Brewster Street  
San Francisco, CA 94110-5304  
415-279-7397  
georgewynns@gmail.com

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

In re: BLOCKFI, INC., Et al.

Debtors.

22-  
) Case No. ~~23~~-19361 Chapter 11  
)  
) **EX PARTE APPLICATION BY**  
) **SECURED CREDITOR**  
) **GEORGE WYNNS FOR**  
) **ADDITIONAL TIME TO**  
) **FURNISH APPELLANT'S**  
) **NOTICE DESIGNATING .**  
) **RECORD ON APPEAL AND**  
) **STATEMENT OF ISSUES;**  
) **DECLARATION OF**  
) **APPELLANT**  
)  
) Hon. Michael B. Kaplan, Judge

EX PARTE APPLICATION BY APPELLANT, GEORGE WYNNS,  
FOR ADDITIONAL TIME TO FURNISH NOTICE DESIGNATING  
RECORD ON APPEAL AND STATEMENT OF ISSUES; SUPPORTING  
DECLARATION.

1 Appellant George S. Wynns respectfully requests a two-week extension of  
2 time for the filing of Appellant's Notice Designating Record on Appeal for his  
3 appeal filed November 20, 2023. The Court has stated that the Designation of the  
4 Record is now due December 4, 2023. The Appellant needs further time to file  
5 and serve the Designation and Statement of Issues on Appeal for good cause as set  
6 forth in the supporting declaration following:  
7

8 Dated: November 29, 2023  
9  
10  
11

12 George S. Wynns  
13

14 DECLARATION OF GEORGE S. WYNNS

15 1. I am a secured creditor of the Debtor, Blockfi, Inc. and related entities that  
16 have been holding 4.22 Bitcoin belonging to me, held as security for loans.  
17

18 2. On November 20, 2023, I filed Notice of Appeal, appealing this Court's  
19 final orders denying my motion for return of my Bitcoin in exchange for payment  
20 of my loans, entered on November 6, 2023, and also this Court's Order granting  
21 the Debtor's Tenth Omnibus Objection to Certain Claims, entered on or about  
22 November 20, 2023.  
23

24 3. I reside in California, am not eligible to file electronically, and have had to  
25 make my filings via U.S. Mail or Fedex. I am representing myself I pro se.  
26  
27  
28

1 4. Fedex lost my originally submitted Notice filing which should have been  
2 filed, with associated supporting documents, on November 6, 2023.


3  
4 5. New Jersey process server Charles Deeck filed a skeletal notice of appeal  
5 for me on November 20, 2023, because Fedex had not yet found my documents.  
6 Later the same afternoon, the Court Clerks, who had somehow received the lost  
7 Fedex package, filed the documents I had originally sent. There were thus two  
8 notices of appeal filed. The one filed for me by Mr. Deeck was clearer concerning  
9 what was being appealed and was filed first.  
10

11  
12 6. I am currently 300 miles away from my home and office at 124 Brewster  
13 Street, San Francisco, California, and expect to return within a few days.  
14

15 7. Because of the distance from my home and office, I need additional time to  
16 prepare, serve, and deliver to the Court my Notice Designating the Record for the  
17 Appeal. I therefore respectfully request that the time for furnishing the same be  
18 extended from December 4, 2023, until December 20, 2023.  
19

20  
21 I declare under penalty of perjury under the laws of the United States the  
22 foregoing is true and correct.

23 Dated, November 29, 2023  
24

25   
26 George S. Wynn  
27  
28